REMARKS

Claims 1 - 24 are in the application. Claims 2 – 6, 9 – 13, 16 - 18, and 21 were previously presented; claims 1, 19, 22, and 24 are currently amended; claims 25 – 28 have been canceled; and claims 7, 8, 14, 15, 20, and 23 remain unchanged from the original versions thereof. Claims 1, 22, and 24 are the independent claims herein.

No new matter has been added to the application as a result of the amendments submitted herewith. Reconsideration and further examination are respectfully requested.

Claim Objections

Claim 19 was objected to for containing an informality therein. Claim 19 is currently amended to overcome the objection by clarifying that which is claimed by Applicant as indicated in the claim listing hereinabove.

Accordingly, Applicant respectfully requests the objection of claim 19 be reconsidered and withdrawn.

Claim Rejections – 35 USC § 102

Claims 1 – 9, 15 – 18, 20, and 22 - 24 were rejected under 35 U.S.C. 102(e) as being anticipated by Townsend (2002/0188861). This rejection is respectfully traversed.

Claim 1 recites, in part, automatically processing, by a computer, the information received to associate the received information with a first set of risk variables related to the particular security risk event; defining a second set of risk variables related to the particular security risk event, wherein the first set of risk variables and the second set of risk variables are different; manually associating, in an instance the received information cannot be automatically processed to associate the received information with the first set of risk variables, the first set of risk variables with the received

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information that cannot be automatically processed; and automatically executing an action in response to said security level exceeding a predetermined threshold. Thus, it is clear that Applicant recites a process wherein an action is automatically executed in response to the security level exceeding a predetermined threshold, and in an instance the received information cannot be automatically processed to associate the received information, manually associating the first set of risk variables with the received information that cannot be automatically processed.

The cited and relied upon Townsend fails to disclose or suggest the claimed process including manually associating, in an instance the received information cannot be automatically processed, the first set of risk variables with the received information that cannot be automatically processed; and automatically executing an action in response to the security level exceeding a predetermined threshold.

Despite a very detailed and purportedly complete solution to the problem presented in Townsend {FIG. 1], Townsend fails to disclose or suggest the claimed manually associating of the received information with the received information that cannot be automatically processed; and automatically executing an action in response to the security level exceeding a predetermined threshold. To the contrary, the explicitly disclosed Townsend "exception conditions" do not include manually associating risk variables with the received information. (See Townsend, paragraphs [0049] – [0050]). In fact, the exception conditions do not invoke ant manually actions.

Additionally, Townsend fails to disclose a method, system, or program instructions that include automatically executing an action in response to the security level exceeding a predetermined threshold. Unlike Applicant's claims, Townsend explicitly discloses providing a report, including other management information regarding current and recommended countermeasure implementations. (See Townsend, paragraph [0050]) The stark contrast between the pro-active nature of the claimed invention and the passive nature of Townsend highlights yet another difference between Townsend and the pending claims.

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Accordingly, Applicant respectfully submits that claim 1 is patentable over the cited and relied upon Townsend under 35 USC 102(e) since each and every aspect of claim 1 is not disclosed by Townsend. Claims 2 – 9, 15 – 18, and 20 depend from claim 1. Applicant respectfully submits that claims 2 – 9, 15 – 18, and 20 are also patentable over the cited and relied upon Townsend under 35 USC 102(e) for at least depending from an allowable base claim.

Furthermore, Applicant respectfully submits that claims 22 – 24 are patentable over Townsend for at least the same reasons provided herein regarding claim 1.

Accordingly, Applicant respectfully submits that claims 1 – 9, 15 – 18, 20, and 22 – 24 are patentable over the cited and relied upon Townsend under 35 USC 102(e). The reconsideration and withdrawal of the rejection under 35 USC 102(e) is therefore respectfully requested.

Claim Rejections – 35 USC § 103

Claims 10 -14, 19, and 21 were rejected under 35 U.S.C. 103(a) as being unpatentable over Townsend and Teller-Kanzler et al. This rejection is respectfully traversed.

Claims 10 -14 and 21 depend from claim 1. Inasmuch as Applicant has clearly shown that Townsend fails to disclose or suggest that for which it is cited and relied upon for disclosing with respect to claim 1, combining the actual disclosure of Townsend with the alleged suggestions of Teller-Kanzler would not render claims 10 – 14 and 21 obvious under 35 USC 103(a).
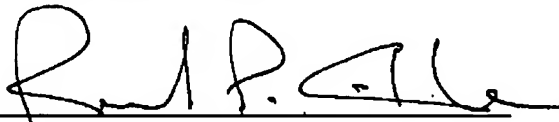
Accordingly, Applicant respectfully submits that claims 20 and 21 are patentable over the cited and relied upon Townsend and Teller-Kanzler under 35 USC 103(a).

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CONCLUSION

Accordingly, Applicants respectfully request allowance of the pending claims. If any issues remain, or if the Examiner has any further suggestions for expediting allowance of the present application, the Examiner is kindly invited to contact the undersigned via telephone at (203) 972-5985.

Respectfully submitted,

May 8, 2007
Date

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